USAG BAUMHOLDER

LEAD-BASED PAINT MANAGEMENT PLAN

January 2009

TABLE OF CONTENTS

TABLE OF CONTENTS (CONT.)

ACRONYMS

B & G	Buildings & Grounds
BOID	Business Operation Information Division
USAG	US Army Garrison
CDC	Child development Center
DFMWR	Directorate of Family, Morale, Welfare and Recreation
DPW	Directorate of Public Works
EMD	Environmental Management Division
EP&S	Engineering Plans and Services Division
HSG	Housing Division
HUD	Department of Housing and Urban Development
ISO	Installation Safety Office
LBP	Lead-Based Paint
LHMT	Lead Hazard Management Team
MEDDAC	Medical Department Activity
OSHA	Occupational Safety & Health Administration
PAO	Public Affairs Office
SJA	Staff Judge Advocate
SOP	Standard Operating Procedure

1. GENERAL PROVISIONS

1-1. BACKGROUND

For many years, lead, a naturally occurring mineral, was used extensively in paints and coatings for housing units, vessels and steel structures because of its ability to improve strength, appearance, and resistance to atmospheric and marine deterioration.

Lead is a heavy metal, which is toxic to human beings. Unfortunately, lead-based paints and coatings subsequently were found to pose health hazards. Lead can be ingested through paint chips from deteriorated paint, and can be inhaled through dust created when maintenance or removal work is done. Common sources of lead exposure are lead in paint; lead in air (industrial emissions, auto emissions); lead dust on toys, pets, horizontal surfaces; lead in food (solder in cans, lead contaminated food); and lead in water (soldered joints, lead pipes).

Lead is an occupational hazard for service members and civilian employees. It could also be a hazard for family members. Children under six and unborn children are especially sensitive to lead exposures. Lead can cause damage to the nervous system and other adverse health effects. Readiness suffers when military personnel become ill, or when they are concerned about their families' health.

Because of these health hazards, in the late 1970's the US Consumer Product Safety Commission banned the use of lead-based paints and coatings in residential and public buildings. Housing constructed prior to 1978 is considered to potentially have lead-based paint (LBP). However, if properly managed and maintained, lead-based paint does not pose a health risk.

1-2. PURPOSE

- To provide healthy living conditions, and working environment for all service members and their families.

- To identify and control lead hazards from lead contaminated paint, dust and soil, and from other sources in Army housing and child-occupied facilities.

- To establish safe and proper procedures which are in compliance with pertinent regulatory requirements regarding lead-based paint handling activities.

- To reduce exposure to and prevent lead contamination.

1-3. SCOPE

This plan defines procedures and protocols used in the identification, control and removal of LBP from real property at USAG Baumholder. This applies to all personnel, commands, directorates, activities, tenants, contractors, and organizations located or conducting operations at USAG Baumholder.

1-4. POLICY

Army lead policy is to proactively anticipate hazards such as overexposure to lead and to eliminate them before they occur. An overexposure to lead is a combination of three elements, "people, sources of lead, and a pathway between them such as paint, dust, soil or air". Army policy is designed to prevent this combination by isolating or removing one of these elements from the others.

The USAG Baumholder policy is to identify and manage all LBP materials within its area of responsibility. The Directorate of Public Works (DPW) will manage or abate all surfaces that contain LBP above regulatory limits that pose an immediate health hazard. This includes deteriorated LBP and lead-contaminated dust in target facilities and public buildings, exterior painted structures (such as playground equipment) and lead-contaminated soil. The goal is to systematically eliminate all lead hazards. Prevention of lead poisoning is an integral part of this policy.

1-5. DEFINITIONS

Definitions with relevance to lead-based paint may be found in the latest version of the FGS Germany, Chapter 17, Lead-Based Paint. Note: The current FGS for Germany is undergoing a revision; Appendix A describes proposed revisions to Chapter 17, including definitions. It is anticipated that the revised FGS will be issued in 2009.

1-6. APPLICABLE REGULATIONS, GUIDANCES AND CONDUCTED INTERVIEWS

a. FINAL GOVERNING STANDARDS (FGS):
   (1) Lead-Based Paint, Chapter 17, 2005. (See note above)

b. US FEDERAL REGULATIONS & GUIDANCES:
   (1) U.S. Department of Housing and Urban Development (HUD):
      (a) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Jun 95; with revised Chapter 7, 1997 version.
   (2) Environmental Protection Agency (EPA) Regulations:
      (a) 40 CFR Part 745, Lead; Identification of Dangerous Levels of Lead, Final Rule, 6 Mar 2001.
      (b) 40 CFR Part 745, Lead; Requirements for Hazard Education before Renovation of Target Housing, Final Rule, 1 Jun 98.
      (c) 40 CFR Part 745, Lead; Requirements for Lead-Based Paint Activities in Target Housing and Child Occupied Facilities, Final Rule, 29 Aug 96.
      (d) 40 CFR Part 745, Lead; Requirements for Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards in Housing, Final Rule, 6 Mar 96.

c. ARMY REGULATIONS & GUIDANCES:
   (1) AR 200-1, Environmental Protection and Enhancement, 13 Dec 2007, Chapter 9-2 "Toxic Substances".

(2) AER 200-1, 26 Oct 2007, Army in Europe Environmental Quality Program, Chapter 17 Lead-Based Paint Management.
(3) AR 420-70, Building and Structures, 11 Nov 1997, Chapter 3 "Hazardous Building Materials".
(4) Department of the Army Public Works Technical Bulletin No. 420-70-2 "Installation Lead Hazard Management", 20 Feb 1997.

d. HOST NATION REGULATIONS:
(1) Ordinance on Hazardous Substances (*Gefahrstoffverordnung*), 23 Dec 04.
(2) Ordinance on the Ban and on Restrictions for Placing on the Market of Dangerous Substances (*Chemikalienverbotsverordnung*), 13 Jun 03.
(3) Technical Rule on Hazardous Substances– Lead (*TRGS 505*), Feb 07.
(4) Federal Soil Protection Regulation (Bundesbodenschutzverordnung – BBodSchV), July 99.

e. CONDUCTED INTERVIEWS
Interviews were conducted with the following individuals in order to prepare this management plan:
(1) Mr. Dominic Mutinda (Chief, EMD, DPW)
(2) Mr. Kai Weber (Environmental Engineer, EMD, DPW)
(3) Mr. Krastins (Master Planner, DPW)
(4) Mr. Knorr (Safety Officer, Garrison Safety Office)
(5) Ms. Schummel (Chief, Buildings and Grounds, DPW).

It should be noted that the Final Governing Standards for Germany are the applicable regulations in the first instance. However, the FGS does not provide procedures or guideline values in all cases. In these cases this management plan refers to procedures or guidelines specified in other regulations listed above (see Appendix B). This management plan specifies case by case the source of procedure, guideline, etc.

2. ROLES AND RESPONSIBILITIES

The different roles and responsibilities of the distinct divisions and offices are described in Appendix C.

3. QUALIFICATIONS AND TRAINING

3-1. LEAD HAZARD MANAGEMENT TRAINING REQUIREMENTS

In accordance with the FGS for Germany, AR 200-1 and applicable German regulations, the following qualifications and training are required for the listed lead based paint activities:

- Paint Inspection
- Risk Assessment
- Specification or Design
- Supervision
- Abatement

3-1.1 FGS

According to the latest version of the FGS for Germany (2005) the Garrison must ensure that all personnel involved in lead-based paint activities, including paint inspections, risk assessments, specification or design, supervision and abatement are properly trained.

Furthermore the FGS specifies the following: "All local national employees involved in lead-based paint and lead dust activities must be instructed prior to initiating work activities. The instruction must address operating procedures, protective measures, and employment restrictions. The instruction must be repeated yearly and renewed for each work site. The content and the date/time of the instruction have to be documented and confirmed by the local national personnel receiving the instruction via their signature. This instruction requirement is associated with construction work sites and the supervision of work activities. This requirement is not associated with the conduct of inspections or risk assessments or the development of specifications or designs."

3-1.2 AR 200-1

Army Regulation 200-1 includes the following statement regarding training requirements: "Ensure that all workers that perform lead abatement work in child occupied facilities and target housing are trained, equipped, and supervised according to EPA lead-based paint abatement requirements and OSHA requirements for lead in construction. (LD: 40 CFR 745 and 29 CFR 1926.62, respectively). Construction work impacting lead-based paint that is not considered abatement of lead-based paint in target housing or child occupied facilities need only comply with OSHA requirements. (LD: 29 CFR 1926.62)"

3-1.3 EPA TRAINING REQUIREMENTS

Individuals identified below are required to be trained by an accredited training program, as defined by 40 CFR Part 745, Subpart L, and certified by EPA pursuant to 40 CFR 745.226 (ref. FR 29 Aug 96). This EPA final rule established training and certification for LBP activities in target housing and child-occupied facilities, mandated by the Toxic Substances Control Act (TSCA), Section 402.

(1) Certified Inspector. A person who conducts a surface by surface investigation to determine the presence of LBP, and the provision of a report explaining the results of the investigation of samples for the presence of lead in dust and soil for the purposes of abatement clearance testing.

(2) Certified Risk Assessor. A person who conducts an on-site investigation to determine the existence, nature, severity, and location of LBP hazards, and the provision of a report by the individual or the firm conducting the risk assessment, explaining the results of the investigation and options for reducing lead-based paint hazards. A certified risk assessor also samples for the presence of lead in dust and soil for the purposes of abatement clearance testing.

(3) Certified Project Designer. A person who prepares abatement project designs, occupant protection plans and abatement reports. EPA does not require that a Certified Project Designer be used for work covered by 40 CFR Part 745, Subpart L.

(4) Certified Supervisor. A person who supervises and conducts abatements, and who prepares occupant protection plans and abatement reports.

(5) Certified Abatement Worker. A person who performs abatement work.

3-1.4 TRGS 505

The German Committee for Occupational Safety has established qualifications and other requirements in a technical rule (TRGS 505) for work associated with lead abatement and lead hazard control activities. Contractors and personnel working on lead abatement sites shall meet the German qualifications and training requirements. Generally, an instruction at a work site is required before abatement work commences.

3-1.5 LEAD-BASED PAINT MAINTENANCE TRAINING

The EPA and the Department of Housing and Urban Development (HUD) has developed a training course entitled, "Lead-Safe Work Practices Training Course." This course is designed for renovators, remodelers, painters and maintenance personnel. The course materials are available at the following web-site: http://www.hud.gov/offices/lead/training/rrp/rrp_course.cfm. In addition, a copy of 'Lead Paint Safety: A Field Guide for Painting, Home Maintenance and Renovation Work' developed by the HUD, the Center for Disease Control and Prevention (CDC) and the EPA is included in Appendix D.

3-2. CURRENT SITUATION

Currently, there are no trained personnel at the USAG Baumholder as required for all the aforementioned activities and in accordance with the FGS. Both Mr. Mutinda and Mr. Weber, DPW, EMD received lead inspector and risk assessor training; however, their certifications are no longer valid. In addition, DPW, Buildings and Grounds personnel, who may come into contact with lead-based paint unknowingly, have not received awareness training.

All work requiring a certified inspector, risk assessor, project designer, supervisor and abatement worker is conducted through contractors, if required.

3-3. RECOMMENDATION

Currently, the Garrison has only identified lead in the artificial turf of the playground near Building 8099, Child Development Center, within Baumholder Family Housing (see section 4 below). All other known lead hazards in child-occupied facilities have been abated according to

the DPW. As a result training is not deemed necessary at this time, as long as appropriately certified contractors are used for further inspections, etc. If training is obtained, copies of training certificates for the DPW, EMD will be maintained in Appendix E; other organizations should maintain copies of training certificates in their personnel files.

4. IDENTIFY LEAD-BASED PAINT HAZARDS IN CHILD-OCCUPIED FACILITIES AND MILITARY FAMILY HOUSING

4-1. CHILD-OCCUPIED FACILITIES AND MILITARY FAMILY HOUSING IN USAG BAUMHOLDER

The child-occupied facilities that exist within the USAG Baumholder are described below.

4-1.1 MILITARY FAMILY HOUSING

Military family housing is located at Baumholder Family Housing and Wetzel Family Housing. The different buildings located in these areas are listed below in tables 4.1 and 4.2. The tables also include the construction date and renovation date provided by the Garrison.

Table 4.1: Baumholder Family Housing (GE 07 K)

No.	Building	Date constructed	Date renovated	No.	Building	Date constructed	Date renovated
1	8006	1952	1990	2	8007	1952	1986
3	8008	1952	1986	4	8009	1953	2004
5	8010	1952	1983	6	8011	1952	1986
7	8012	1952	1987	8	8013	1952	1990
9	8015	1952	2004	10	8016	1952	1985
11	8017	1953	2004	12	8018	1953	1998
13	8019	1953	1997	14	8020	1952	1998
15	8021	1952	1998	16	8023	1952	1998
17	8024	1952	2004	18	8025	1952	2004
19	8026	1952	2004	20	8027	1952	2004
21	8028	1952	1998	22	8029	1952	2004
23	8034	1953	2006	24	8035	1953	1988
25	8036	N/A	N/A	26	8037	1953	2006
27	8038	1953	1984	28	8039	1953	2001
29	8040	1953	2001	30	8046	N/A	N/A
31	8047	1952	2004	32	8048	1952	2004
33	8049	1952	1999	34	8050	1952	1999

No.	Building	Date constructed	Date renovated	No.	Building	Date constructed	Date renovated
35	8051	1952	1999	36	8052	1952	2004
37	8053	1952	1989	38	8054	1952	1981
39	8055	N/A	N/A	40	8056	1952	1985
41	8057	1952	1985	42	8059	1952	1984
43	8060	1952	1986	44	8061	1952	1987
45	8062	1952	1987	46	8063	1952	1983
47	8065	1938	N/A	48	8066	1952	2004
49	8068	1939	2001	50	8070	1956	1999
51	8071	1956	1998	52	8073	1955	2002
53	8074	1953	1998	54	8075	1955	1999
55	8076	N/A	N/A	56	8077	N/A	N/A
57	8078	N/A	N/A	58	8079	1953	1997
59	8080	1953	1999	60	8081	1956	2003
61	8082	1956	2003	62	8083	N/A	N/A
63	8086	N/A	N/A	64	8088	1956	N/A
65	8089	1956	N/A	66	8091	1956	N/A
67	8092	1956	N/A				

N/A not available

Table 4.2: Wetzel Family Housing (GE 94 D)

No.	Building	Date constructed	Date renovated	No.	Building	Date constructed	Date renovated
1	8804	1955	2002	2	8805	1955	2002
3	8806	1955	2002	4	8807	1954	1987
5	8809	1955	2001	6	8810	N/A	N/A
7	8811	1955	1990	8	8812	1955	2001
9	8813	1955	2001	10	8814	1955	1991
11	8815	1955	1992	12	8816	1955	2002
13	8817	1955	2002	14	8818	1955	2003
15	8819	1955	2006	16	8820	1955	2006

No.	Building	Date constructed	Date renovated	No.	Building	Date constructed	Date renovated
17	8821	1955	1986	18	8822	1955	1987
19	8823	1954	1995	20	8824	1955	1986
21	8825	1955	1987	22	8826	1955	1986
23	8827	1955	1987	24	8828	1955	1986
25	8829	1955	1986	26	8830	1954	1985
27	8831	1954	1985	28	8832	N/A	N/A
29	8833	1955	1984	30	8834	1955	1983
31	8835	1955	1982	32	8836	1955	1981
33	8837	1955	1981	34	8840	N/A	N/A

4-1.2 CHILD DEVELOPMENT CENTERS (CDCs)

There are currently three CDCs located within the USAG Baumholder:

- Building 8862 at Wetzel Kaserne (GE 94E),
- Building 8748 at Hospital (GE 07L),
- Building 8099 at Baumholder Family Housing (GE 07K).

The CDC located on Wetzel Kaserne was constructed in 1990. Some renovations were conducted in 2003 and 2004. The renovations included the replacement of two interior walls and new paint.

The building housing the CDC at the Hospital was built in 1953. General renovations were accomplished in 1999.

The CDC located on Baumholder Family Housing was constructed in 1988. In 2003 a new hands-free speaking system was installed. In 2005 a new fire alarm system was installed. In 2006 further unspecified renovations were conducted.

4-1.3 PLAYGROUNDS

The following playgrounds within the USAG Baumholder are located at the CDC's described under section 4-1.2.:

- PLG-01 constructed in 1988 at Building 8099; renovations were conducted in 2005 (general overhaul) and in 2007 (unspecified).
- PLG-03 built in 1996 at Building 8748; no renovation information is available.
- PLG-08 constructed in 1990 at Building 8862; in 2004 a general overhaul was conducted.

Other playgrounds exist in the recreational areas, at the schools and in the family housing areas.

4-2. IDENTIFICATION OF LEAD-BASED PAINT/LEAD HAZARDS IN USAG BAUMHOLDER

4-2.1 REQUIREMENTS

The FGS for Germany, section C17.3.1.3 requires the Garrison to identify lead-based paint hazards in child-occupied facilities and military family housing.

4-2.2 PAST STUDIES

Two studies were conducted at the USAG Baumholder to identify lead-based paint/lead hazards.

4-2.2.1 WOODWARD-CLYDE INTERNATIONAL (WCI)

WCI conducted a LBP study at the USAG Baumholder (WCI (1997) USAREUR wide LBP risk assessment, Phase 1: BAUMHOLDER 222nd BSB Idar-Oberstein) targeting facilities frequented by children under six and pregnant women. The following facilities were included in the study:

- Smith School Age Center - Child Development Center (CDC), Building 8083, Baumholder
- Smith CDC, Building 8099, Baumholder
- Smith Elementary School (ES), Buildings 8033/8033A, Baumholder
- Baumholder Dental Clinic, Building 8647
- Baumholder Health Clinic, Buildings 8740/8741/8742/8749
- Neubruecke ES, Building 9900, Baumholder *
- Wetzel CDC, Building 8862, Baumholder
- Wetzel ES, Buildings 8882/8884, Baumholder
- Strassburg Kaserne CDC, Building 9040, Idar-Oberstein *
- Strassburg Kaserne Youth Activity Services (YAS), Building 9042, Idar-Oberstein *
- Strassburg Kaserne CDC, Building 9048, Idar-Oberstein *
- Playgrounds (PGs) - Baumholder Army Family Housing (AFH) at Smith Barracks, Birkenfeld *, Neubruecke *, and Wetzel AFH; Idar-Oberstein AFH at Strassburg Kaserne *.

* The Strassburg Kaserne was returned to the Host Nation at the end of 2008. The Neubruecke ES was closed in FY08; the entire installation will be returned to the Host Nation end of FY09. The Birkenfeld installation was returned to the Host Nation before the end of 2008.

According to the WCI report, a lead hazard was identified at the following facilities:

- Smith CDC, Building 8083, Baumholder (Note: this facility is no longer used as a CDC)

- Smith ES, Buildings 8033/8033A, Baumholder
- Baumholder Health Clinic, Building 8742 (Note: this facility was completely renovated in 2005/2006)
- Neubruecke ES, Building 9900, Baumholder (Note: this facility was closed in FY08)
- Wetzel CDC, Building 8862, Baumholder
- Strassburg Kaserne CDC, Building 9048, Idar-Oberstein (Note: the entire installation was returned to the Host Nation at the end of 2008)
- Baumholder PGs at Smith CDC and Neubruecke ES; Baumholder AFH, Smith Barracks (PG-1); Birkenfeld AFH (PG-1); Neubruecke AFH (PG-1, 2); Wetzel AFH (PG-1, 2, 3) (Note: the Neubruecke ES was closed in FY08; the entire installation will be returned to the Host Nation at the end of FY09. Birkefeld was returned to the Host Nation before the end of 2008)
- Idar-Oberstein PGs, Strassburg Kaserne AFH (PG-1, 2, 3) (Note: the entire installation was returned to the Host Nation at the end of 2008)

4-2.2.2 US ARMY CENTER FOR HEALTH PROMOTION AND PREVENTIVE MEDICINE – EUROPE (CHPPM-EUR) INDUSTRIAL HYGIENE SURVEY

The USACHPPM-EUR conducted a survey of the artificial turf at the Smith Child Development Center (CDC), Building 8099, Smith Barracks, Baumholder for the presence of actual or potential lead health hazards, and to provide recommendations to control or eliminate these hazards. An investigation was necessary, because national news reports have indicated the presence of lead in some state-side artificial turf sports fields.

The results (56 and 148 µg/ft²) of two of the collected wipe samples at the playground exceeded the EPA limit of 40 µg/ft² lead. One composite bulk sample was collected from multiple locations of the green turf areas. This sample also indicated the presence of lead. The measured 5700 ppm lead-content exceeded 400 ppm, which is the limit-value in the soil-lead hazard guideline (40 CFR Part 745).

4-2.3 CURRENT GARRISON PROCEDURES

The Garrison has not conducted required lead-based paint identification surveys of all child-occupied facilities within the Garrison (i.e., military family housing). Identification surveys in the past have only focused on child development centers, elementary schools and playgrounds.

According to DPW, EMD, when whole building renovations are conducted, requirements for lead-based paint testing are included in the contracts. If lead-based paint is detected it is appropriately removed during the whole building renovations. Documentation on the identification and abatement activities is not provided to the DPW, EMD.

According to the DPW, EMD, DPW shop personnel may unknowingly disturb lead-based paint in the course of conducting routine building maintenance and repair activities. Suspect paint, etc. is not generally tested ahead of time.

4-2.4 RECOMMENDATIONS

The Garrison must conduct identification surveys for lead-based paint in the military family housing, unless renovation documentation exist that shows beyond a doubt that any suspected lead-based paint has been completely removed and only lead-free paint has been reapplied (see Appendix F for approved laboratory analytical procedures for lead identification). In addition, the Garrison should consider other potential lead-hazards that could affect children, such as vinyl miniblinds (see Appendix G).

All lead-based paint survey/identification and abatement information should be provided to the DPW, EMD. If documentation cannot be provided, it should be assumed that suspect lead-based paint may exist. A procedure should be written for the Garrison for reporting lead-based paint activities to the DPW, EMD.

All DPW shop personnel should at least receive an awareness training regarding lead-based paint, its hazards, and how they can protect themselves from exposure.

The Garrison should continue to utilize only appropriately certified contractors to conduct lead identification surveys, risk assessments, abatement activities, etc.

5. MANAGE LEAD-BASED PAINT HAZARDS

5-1. MANAGING IDENTIFIED LEAD-BASED PAINT/LEAD HAZARDS THROUGH INTERIM CONTROLS/ABATEMENT

Based upon the results of the two LBP/lead surveys conducted at the USAG Baumholder, the following controls/abatement activities have been completed.

5-1.1 RECOMMENDATIONS FROM WCI SURVEY 1997

Location	Building Component covered with LBP / Areas with LBP-Hazard	Hazard Control Measures		Current Abatement Status
		Short-Term Abatement	Long-Term Abatement	
Building #8083		Paint film stabilization until paint removal or enclosure of LBP	Removal and replacement of painted components	Removed
Buildings #8033/8033A			Removal and replacement of painted components	Removed
Building #8742		Paint film stabilization until paint removal or enclosure of LBP		Removed
Building #8862		Paint film stabilization until paint removal or enclosure of LBP		Removed
Playgrounds at Smith CDC, Baumholder AFH (PG-1, 2), Wetzel AFH		Paint film stabilization until paint removal	Removal and replacement of painted components	Removed

(PG-1, 2, 3)				

According to Ms. Schummel, Chief, Buildings and Grounds, DPW, USAG Baumholder, the short-term control as well as the long-term abatement of all the listed buildings were conducted. As a result no further action is required.

5-1.2 RECOMMENDATION FROM USACHPPM-EUR INDUSTRIAL HYGIENE SURVEY 2008

Hazard Control Measures for the Identified Lead Hazard

Location	Building Component covered with LBP / Areas with LBP-Hazard	Hazard Control Measures		Current Abatement Status
		Short-Term Abatement	Long-Term Abatement	
Playground near Building #8099	Artificial Turf	Restrict the artificial turf area of Building 8099 from child access	Replace all of the artificial turf at the Smith CDC with a certified, lead-free surface covering that meets all child safety guidelines - Dispose of the lead-containing artificial turf in accordance with environmental guidelines	Replaced

According to Ms. Schummel, Chief, Buildings and Grounds, DPW, USAG Baumholder, the artificial turf has been replaced. As a result no further action is required.

5-2. ONGOING MONITORING

Ongoing monitoring is required in all target housing and child-occupied facilities where lead contaminated paint is known or suspected to be present, regardless of the paint's present condition. Ongoing monitoring is performed for previously identified and managed or abated lead hazards and determines if interim control measures have been effective or if new hazards have developed. Ongoing monitoring is not required in dwellings that are known to be free of LBP. On-going monitoring shall be conducted until all sources of lead hazards are abated. Between occupancy, target housing should be re-inspected.

Ongoing monitoring consists of reevaluations performed by certified risk assessors which includes visual examination of all existing LBP hazards and may also include composite dust wipe samples. A visual survey is also conducted by house owners (Housing Office) at least once a year.

Appendix H shows a reevaluation schedule as recommended in accordance with HUD's Standard. This table includes information at which evaluation results an action must be

undertaken and specifies the reevaluation frequency. If reassessments are conducted in the future, this information should be maintained in Appendix I.

5-3. CHILDHOOD LEAD POISONING PREVENTION

No Childhood Lead Poisoning Prevention Program (CLPP) has been developed by the Medical Department Activity. Such a program will be developed if it becomes necessary.

5-4. MEDICAL SURVEILLANCE

In general, the Occupation Health Section from Preventive Medicine Services of the MEDDAC provides medical surveillance to all workers (military personnel and civil service employees) potentially exposed to health hazards in the work environment.

However, no intentional/planned lead abatement work is conducted by USAG Baumholder staff (military personnel and civil service employees). All work that includes potential exposure to lead is contracted out to certified contractors.

5-5. PERSONAL PROTECTIVE EQUIPMENT

As the Garrison does not conduct intentional/planned lead abatement work using in-house staff (military personnel and civil service employees), personal protective equipment is not required.

5-6. DISCLOSURE REQUIREMENT – TARGET HOUSING

The presence of any known lead-based paint or lead-based paint hazards needs to be disclosed to occupants of child-occupied facilities and military family housing. Information on lead-based paint hazards reduction must be provided. In addition, occupants of military family housing must be informed by the Housing Division or the Project Manager prior to conducting remodeling or renovation projects, of the hazards associated with these activities and information on protecting family members from the hazards of lead-based paint must be provided.

Residents must be provided with a document that requires their signature to acknowledge that they have been informed of the lead-based paint or lead-based paint hazards. This form/document needs to be provided and requested that it be signed by the resident prior to their housing assignment and prior to remodeling or renovation projects. The signed document is to be maintained with the residents housing file.

A sample disclosure statement for the presence of known lead-based paint and/or lead-based paint hazards can be found in Appendix J.

Sample acknowledgement and certification statements for renovation projects are provided in Appendix K.

A copy of the EPA pamphlet entitled “Protect Your Family from Lead in Your Home” is enclosed in Appendix L.

6 DOCUMENTATION

As a minimum it must be ensured that the following documentation regarding lead-based paint at the garrison is conducted and maintained:

- Identification surveys,
- Abatement actions,
- Reassessments/monitoring, and
- Training.

If lead-based paint/lead hazards are identified in child-occupied facilities, residents and personnel potentially impacted by its presence should be notified. The notification should be in writing as described above and copies should be maintained.

7. ACTION ITEM LIST

The following actions are recommended for this plan in order to establish and manage a Lead Management Program:

Item	Action to be taken	Responsible Unit	Due Date	Estimated Costs
1	Determine whether lead-based paint/lead hazards exist within child-occupied facilities through identification surveys and/or document reviews.	DPW		Use In-house resources for document review; based on the outcome of the document review, contractor may be needed for further surveys.
2	Provide lead-based paint/lead hazard awareness training to DPW shop personnel.	DPW		Use In-house resources.
3	Develop an SOP for DPW and its contractors to utilize for reporting lead-based paint/lead hazard surveys and abatement activities to the DPW, EMD.	DPW, EMD		Use In-house resources.

APPENDIX A

POTENTIAL CHANGES TO THE FGS FOR GERMANY, CHAPTER 17

The FGS is under revision by the Environmental Executive Agent for Germany (the US Army). This Appendix includes potential changes/revisions to the current FGS, based upon the revised OEBGD (2007) and changes in German law.

Definitions:

Lead-based paint hazard includes paint-lead hazard, dust-lead hazard or soil-lead hazard as identified below:

- Paint-lead hazard. A paint-lead hazard is any of the following:
    - Any lead-based paint on a friction surface that is subject to abrasion and where the lead dust levels on the nearest horizontal surface underneath the friction surface (e.g., the window sill, or floor) are equal to or greater than the dust-lead hazard levels identified in the below definition of "Dust-lead hazard".
    - Any damaged or otherwise deteriorated lead-based paint on an impact surface that is caused by impact from a related building component (such as a doorknob that knocks into a wall or a door that knocks against its doorframe).
    - Any chewable lead-based painted surface on which there is evidence of teeth marks.
    - Any other deteriorated lead-based paint in any residential building or child-occupied facility or on the exterior of any residential building or child-occupied facility.
- Dust-lead hazard (previously defined as lead-contaminated dust). Surface dust in a residential dwelling or child-occupied facility that contains a mass-per-area concentration of lead equal to or exceeding 40 µg/ft on floors or 250 µg/ft on interior window sills based on wipe samples.
- Soil-lead hazard (previously defined as lead-contaminated soil). Bare soil on residential real property or on the property of a child-occupied facility that contains total lead equal to or exceeding 400 ppm (µg/g) in a play area, or an average of 1,200 ppm of bare soil in the rest of the yard based on soil samples.

The following definitions will more than likely be deleted from the FGS:

BAT-Value. Biological Tolerance of Occupational Substances. This is the concentration of a substance (in blood or urine) that generally does not impair employees' health.

DIN. Deutsches Institut für Normung, e.V. German Institute for Standardization, registered association.

MAK-value (Maximale Arbeitsplatzkonzentration). Maximum workplace concentration value. This is the concentration of a substance in the air at workplace that in general does not impair the health of the employees.

TRK-Value (Technische Richtkonzentration). Technical Concentration Limit. This is the concentration of a toxic or hazardous substance in the air at a workplace that is feasible provided that state of the art work-processes and methods are implemented.

State of the Art (*Stand der Technik*). State of development of progressive processes (*Entwicklungsstand fortschrittlicher Verfahren*). Facilities or operating procedures, which seem to warrant the practical suitability of a procedure to protect health; (*Einrichtungen oder Betriebsweisen, der die praktische Eignung einer Maßnahme zum Schutz der Gesundheit gesichert erscheinen läßt*).

Criteria:

The following criterion will be replace the existing one:

C17.3.1.3.1. Lead-based paint risk assessment screen. If screen identifies dust-lead levels >25 µg/ft2 for floors, or >125 µg/ft2 for interior window sills, a lead-based paint risk assessment should be performed.

The following criteria will more than likely be deleted from the FGS:

C17.3.1.4. Ensure occupants and worker protection measures are taken during all maintenance, repair, and renovation activities that disturb areas known or assumed to have lead-based paint.

C17.3.1.6. Ensure that all personnel involved in lead-based activities, including paint inspection, risk assessment, specification or design, supervision, and abatement, are properly trained.

New additional requirements may be added to reflect the new Ordinance on Hazardous Substances and the Technical Rules for Hazardous Substances: Lead (TRGS 505); however, no final decisions have been made at this time.

APPENDIX B

STANDARD LIMITS OF LEAD CONCENTRATION IN MATRICES

Significant Lead Concentration in Matrices

Matrix	Concentration	Agency	Application	Basis
Paint	>1.0 mg/cm^2		Dried Film - LBP (Abatement)	Technology
	>5000 ppm (ug/g) (>0.5%)	HUD	Dried Film – LBP (Abatement)	Technology
	<600 ppm (ug/g) (0.6%)	CPSC	Liquid Form – Lead Free (For residential application)	Impurity Level
Dust	100 µg/ft^2	G-FGS	Uncarpeted floor - Risk assessment and Clearance	Health
	500 µg/ft^2	G-FGS	Window Stool (Sill) – Risk assessment and Clearance	Health
	800 µg/ft^2	G-FGS	Window Trough (well) Risk assessment and Clearance	Health
Bare Soil	200 mg/kg for playgrounds, 400 mg/kg for residential areas	BBod SchV	Public Notice. Interim controls (change use patterns and provide barriers for children)	Health
Solid waste	0.02 mg/L leachable lead (TCLP)	LAGA	Hazardous Waste characterization	Environment
Blood	700 µg/L	BAT	All national employees	Health
	300 µg/L	BAT	Women under age 45	Health
Water	0 ppb (µg/l)	G-FGS	Maximum Contaminant Level Goal (MCLG)	Health
	15 ppb (µg/l)	G-FGS	Public Notice	Health
Potable Water	0.2%	G-FGS	Solder	Health
	8.0%	G-FGS	Pipes and Fixtures	Technology
Air	0.1 mg/m^3	MAK	Maximum air concentration	Air Quality
	2.0 mg/m^3	MAK	Maximum work site concentration	Health
Ceramic or Pottery Glasses	3ppm 2ppm 1ppm 0ppm	FDA FDA FDA FDA	Flatware Small Hollow-ware Large Hollow-ware Cups, Mugs, and Pitchers	Health Health Health Health

APPENDIX C

ROLES AND RESPONSIBILITIES

A. GARRISON COMMANDER. The Garrison Commander is ultimately responsible for the activities of the DPW and will ensure compliance with the lead-based paint management requirements.

B. DIRECTORATE OF PUBLIC WORKS (DPW) DIRECTOR. The Director of the DPW is responsible for funding the lead-based paint management program, to include lead-based paint identification surveys in army family housing, to ensure compliance with applicable requirements.

C. DPW, ENVIRONMENTAL MANAGEMENT DIVISION (EMD).

(1) Responsible for management of the Lead Hazard Management Program by assessing the extent of the lead problems and developing a coordinated effort to prevent lead hazards.

(2) Serves as a technical consultant, assisting DPW with the design and execution of contract LBP abatement and control projects.

(3) Maintains all records relating to LBP identification, control and removal actions.

(4) Establishes and maintains the computer database of lead testing and assessment results. Also ensures information is updated and available, so users, engineers, shop personnel, custodial and others can identify potential LBP containing areas.

(5) Ensures the high risk facilities and facilities used for child related activities be inspected and assessed for lead hazards. Provide the results to appropriate organizations, including MEDDAC for risk communication/public relations concerning health related lead issues.

(6) Assists DPW Housing for LBP survey, which includes risk assessments of representative dwelling units in housing areas, and provides recommendations for corrective actions.

(7) In coordination with housing office, conduct reevaluation of lead-based paint dwelling units as a part of ongoing monitoring process.

(8) Performs or coordinates sampling including TCLP testing for classification of lead contaminated waste, inspections/ screening for LBP and associated hazards upon request.

(9) Assists in remediation process to reduce the LBP hazard exposure in coordination with DPW-Housing Division and health authorities.

(10) Conducts Lead-Based Paint Management Subcommittee meetings as part of the Environmental Quality Control Committee (EQCC) meetings quarterly.

(11) Performs (or coordinates) final inspection and clearance of in-house lead control/abatement projects.

(12) Ensures proper handling, storage, transportation and disposal of lead contaminated waste.

(13) Provides input for work order requests of possible environmental impact, to include LBP.

(14) Reviews and provides input for lead abatement plans/contract specification/submittals of activities related to lead containing paint to ensure compliance with environmental regulations.

(15) Reports instances of environmental lead contamination through proper channels and ensure necessary cleanup actions are taken.

(16) Documents that EMD, HSG and O&M lead management program personnel are properly trained/ certified/accredited. Provides information to other DPW divisions on regulatory requirements of lead training/certification involved with lead related projects.

D. DPW, ENGINEERING PLANS AND SERVICES DIVISION (EP&S).

(1) Manages DPW construction projects including maintenance contract for family housing in accordance with the lead-based paint management plan.

(2) Ensures adequate identification of LBP prior to the start of any renovation or demolition project. Requests EMD check existing survey and testing records prior to any work that may disturb any LBP. Requests additional testing if area scheduled for work is questionable.

(3) Provides EMD with the results of any of the LBP testing conducted by contractors so that lead database entries could be updated.

(4) Provides EMD and other appropriate offices of any contract specifications/submittals related to LBP control/abatement activities for review and input to ensure the requirements stated in this management plan are followed.

(5) Provides EMD with results and documentation of lead abatement done through contracts in order that lead data may be updated.

(6) Ensures proper coordination has been made with facility/building occupant prior to start of any work. Ensures EMD or an appropriate contractor is requested by the project manager or government site inspector for TCLP-lead testing (of lead painted building components to be removed) for waste classification prior to start of on-site work. Ensures that contractors contact EMD in advance for coordination to ensure regulated lead contaminated/hazardous waste is disposed of properly.

(7) Informs EMD of any lead contamination incident so that proper response action may be taken.

(8) Documents that the division employees involved with lead-based paint activities are properly trained/certified/accredited in accordance with the requirements listed in Section 3.

(9) Ensures that contractors follow the contract specifications in compliance with the regulatory requirements. Contractor oversight should include: appropriate signage, notification, access control, proper containment and lead waste disposal.

(10) Ensures that contractors who perform the renovation of target housing (pre 1978) provide a copy of the EPA lead hazard information pamphlet, entitled "Protect Your Family from Lead in Your Home" to an adult occupant of such housing prior to the renovation activities. Additionally, a brief information about nature/location/timing of the work shall be provided to the occupants as required by the regulation.

E. DPW, HOUSING DIVISION (HSG).

(1) Inspects the condition of paint, and ensures good maintenance practices (such as repainting on a regular basis) as residence rotates. This can help maintain surfaces and thus prevent the potential exposure of lead paint hazards to the occupants.

(2) Initiates work order upon occupant's request to fix poor condition of painted surfaces to eliminate the potential exposure of LBP.

(3) Fulfills the disclosure requirements concerning LBP hazard notification in accordance with the requirements listed in this management plan. (See details in Section 10-1 of this document)

(4) Ensures that corrective actions be planned and taken to minimize the potential lead exposure to the utmost extent possible, based on the LBP survey findings and recommendations.

(5) Conducts an annual or periodic visual inspection of lead-based paint dwelling units as a part of ongoing monitoring process for target housing (pre-1978).

(6) Informs EMD of any deteriorated paint condition of playground equipment noticed on regular safety inspection for lead-based paint identification.

(7) Documents that employees involved in LBP activities are properly trained/certified/accredited.

(8) Informs EMD of any lead contamination incident so that proper action may be taken to clean it up.

(9) Programs for lead control/ abatement projects for Army Family Housing as funds become available.

F. DPW, BUSINESS OPERATION INFORMATION DIVISION (BOID).

(1) Ensures adequate funding is programmed for lead control/abatement projects for post buildings (non-housing).

(2) Evaluates and estimates work requests for self-help and troop projects. Requests that EMD provide LBP identification and testing prior to estimating process and self-help work being conducted by building occupants (to avoid possible disturbance and exposure to LBP).

(3) Informs EMD of any lead contamination incident so that proper action may be taken to clean it up.

(4) Documents that Designer/Planner involved with lead-based paint activities are properly trained/certified/accredited in accordance with the requirements listed in Chapter 3.

(5) Provides EMD and other appropriate offices with contract specifications/submittals related to LBP activities for review and input to ensure that the requirements listed in this management plan are followed.

(6) Ensures that contractors who perform the renovation of buildings (non-housing, pre 1978) provide brief information about nature/location/timing of the work to the occupants as required.

(7) Ensures that in-house work projects, which impact LBP, are properly identified through the work order system.

(8) Notifies EMD about contractor and in-house abatement projects.

G. COMMUNITY HEALTH.

The community Health Nurse is CPT Jackson (phone: 06783 6 7312). General tasks include:

(1) Evaluates elevated blood lead levels in children under the age of six who live in Army housing units.

(2) Provides coordinated health care management of children with elevated blood lead levels.

(3) Coordinates with the DPW to conduct environmental risk assessment of appropriate Army housing unit when a child is identified with an elevated blood lead level of ≥ 15 µg/dl.

(4) Works with DPW Housing to provide community-level intervention, and multifaceted outreach education as required.

G. U.S. ARMY CENTER FOR HEALTH PROMOTION AND PREVENTIVE MEDICINE – EUROPE (CHPPM-EUR), INDUSTRIAL HYGIENIST.

The contact person for the CHPPM-EUR is Mr. John McCoy (phone: 06783 6 7035). Tasks include:

(1) Provides general oversight and consultation as needed/requested.

(2) Provides air sampling support when requested.

(3) Provides recommendations on the proper PPE selection and usage.

H. OCCUPATIONAL HEALTH.

The Occupational Health Nurse, Ms. Barbara Smith (phone: 0611 705 6994), is responsible for the following:

(1) Performs necessary medical examinations in accordance with the medical surveillance protocol (see Section 6.3) for lead exposed employees if required.

(2) Coordinates/provides pulmonary function testing to government employees participating in a respiratory protection program.

(3) Maintains medical records for government employees.

I. SAFETY OFFICE (ISO).

Safety Office POCs are Mr. Knorr (phone: 06783 6 1670) and Ms. Boney (phone: 06783 6 8222). Safety Office tasks include the following:

(1) Reviews and provides input to lead control / abatement plans for compliance with OSHA regulations.

(2) Informs the EMD of any lead contamination incident so that proper action may be taken to clean it up.

(3) Upon request, provides overall safety inspections on in-house lead abatement projects.

(4) Notify the EMD of any deteriorated paint condition from old playground equipment, especially pre 1978, while conducting regular safety inspection of this equipment.

J. STAFF JUDGE ADVOCATE.

(1) Provides assistance in legal matters related to lead issues.

(2) Provides advice on legal questions concerning lead matters.

(3) Reviews past litigation concerning lead matters.

(4) Reviews correspondence related to legal issues between the installation and German Authorities.

(5) Provides legal advice and guidance on the release of survey information to the housing occupants, installation employees, and general public (including potential contractors) in accordance with the Freedom of Information Act and other relevant laws.

K. PUBLIC AFFAIRS OFFICE (PAO).

(1) Acts as a liaison between USAG Baumholder and the Army community news media in lead matters.

(2) Plans and conducts public affairs activities in support of the lead-based paint management program.

(3) Publishes the installation’s lead hazard management effort using available media at its disposal.

APPENDIX D

'LEAD PAINT SAFETY: A FIELD GUIDE FOR PAINTING, HOME MAINTENANCE AND RENOVATION WORK'

APPENDIX E

LEAD-BASED PAINT TRAINING CERTIFICATES FOR THE DPW, EMD

APPENDIX F

LABORATORY ANALYTICAL PROCEDURES

The EPA has established the national Lead Laboratory Accreditation Program (NLLAP). Only NLLAP or German equivalent accredited laboratories will be used for the matrices of interest (paint chip, dust wipes & soil) in providing data for lead hazard management activities.

The analytical methods for analyzing paint samples are specified in the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing from June 1995. Further information about analytical methods includes: ASTM ES-28-94, ASTM ES-36-94 (or ES-37-94), and ASTM ES-1613-94.

The following methods may be used to analyze lead samples, according to the HUD Guidelines, Appendix 14.1:

1. Standard Operating Procedures for Lead in Paint by Hotplate- or Microwave-Based Acid Digestions and Atomic Absorption or Inductively Coupled Plasma Emission Spectrometry, September 1991, NTIS Publication PB92-114172 (EPA 600/8-91/231)
2. NIOSH Methods 7082 and 7300 (NIOSH Manual of Analytical Methods, Third Edition, 1984, Revised 8/15/90, DHHS SN-917-011-00000-1)
3. EPA Methods 200.7, 200.8, 200.9 and 239.2 (Methods for the Chemical Analysis of Water and Wastes, March 1983, NTIS Publication PB84-128677 and Methods for the Determination of Metals in Environmental Samples, June 1991, NTIS Publication 91-231498)
4. EPA Methods 6010, 6020, 7420 and 7421 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, EPA SW-846, Third Edition, revised November 1986, EPA Publications PB88-239223 and PB89-148076)
5. Standard Method 3500-Pb (Standard Methods for the Examination of Water and Wastewater, 17th Edition, 1989, APHA/AWWA/WPCF/American Public Health Association)
6. ASTM Methods D3335 and D3618 (Annual Book of ASTM Standards, American Society of Testing and Materials, Philadelphia, PA published annually)
7. EPA Reference Method for the Determination of Lead in Suspended Particulate Matter Collected from Ambient Air (40 CFR Part 50, Appendix H)
8. EPA Method 3015, Microwave Assisted Acid Digestion of Aqueous Samples and Extracts
9. EPA Method 3051, Microwave Assisted Digestion of Sediments, Sludges, Soils, and Oils
10. EPA Method 3050, Acid Digestion of Sediments, Sludges, and Soils

APPENDIX G

LEAD IN VINYL MINIBLINDS

1. GENERAL

a. On June 25, 1996, the Consumer Product Safety Commission (CPSC) issued press release #96-150, entitled "CPSC Finds Lead Poisoning Hazard for Young Children in Imported Vinyl Miniblinds." The CPSC release applies only to non-glossy vinyl plastic miniblinds imported from China, Taiwan, Mexico, and Indonesia. They are made with plastics containing lead, which is released when the plastic surfaces deteriorate from heat or sunlight.

b. The CPSC has not actually recalled any vinyl miniblind products; however, the CPSC recommends removing these miniblinds in housing where young children live. Complying with the CPSC recommendation is not only health-protective but also practical, because of the relatively low cost of replacement products.

2. POLICY

The Army's policy of providing a healthful living and working environment for soldiers, their families, and civilians includes controlling lead hazards from all sources, including miniblinds. The Installation lead hazard management team will identify, prioritize, remove and dispose of these miniblinds, and to educate occupants on ways in which they can protect their families from lead exposure. Lead-containing miniblinds do not constitute an immediate health threat, but are a health concern.

APPENDIX H

RECOMMENDED STANDARD REEVALUATION SCHEDULE (IAW HUD's STANDARD)

Schedule	Evaluation Results	Action taken	Reevaluation Frequency	Visual Survey
1	No LBP/leaded dust or soil.	None	None	None
2	No LBP hazards found during risk assessment conducted before hazard control or at clearance (hazards include dust and soil).	None	3 years	Annually & whenever information indicates a possible problem.
3	Average leaded dust levels exceed the limits, but by less than a factor of 10.	Interim control and/or hazard abatement	1 year, 2 years	Same as Schedule 2, except for encapsulants (visual survey by 1 month, 6 months later and annually thereafter).
		Interim control and/or hazard abatement plus replacement of windows with lead hazards.	1 year	
		Abatement of all LBP using encapsulation or enclosure	None	
		Removal of all LBP	None	None
4	Average leaded dust levels exceed the limits by a factor of 10 or more.	Interim control and/or hazard abatement	6 months, 1 year, 2 years	Same as Schedule 3

Schedule	Evaluation Results	Action taken	Reevaluation Frequency	Visual Survey
		Interim control and/or hazard abatement plus replacement of windows with lead hazards	6 months, 2 years	Same as Schedule 3
		Abatement of all LBP using encapsulation or enclosure	None	Same as Schedule 3
		Removal of all LBP	None	None
5	No leaded dust or leaded soil hazards identified, but LBP or LBP hazards are found	Interim control and/or hazard abatement	2 years	Same as schedule 3
		Interim control and/or hazard abatement plus replacement of windows with lead hazards	3 years	Same as Schedule 3
		Abatement of all LBP hazards, but not all LBP	4 years	Same as Schedule 3
		Abatement of all LBP using encapsulation or enclosure	None	Same as Schedule 3
		Removal of all LBP	None	None
6	Bare leaded soil exceeds standard, but less than 5,000 µg/g.	Interim controls	None	Three months to check new ground cover, then annually to identify new bare spots.
7	Bare leaded soil greater than or equal to 5,000	Abatement (paving or	None	None for removal; Annually to identify

Schedule	Evaluation Results	Action taken	Reevaluation Frequency	Visual Survey
	µg/g.	removal)		new bare spots or deterioration of paving.

APPENDIX I

GARRISON REASSESSMENT DOCUMENTATION

APPENDIX J

SAMPLE DISCLOSURE STATEMENT FOR KNOWN LEAD-BASED PAINT/LEAD-BASED PAINT HAZARDS IN HOUSING

As housing constructed before 1978 may contain lead-based paint and lead from paint, paint chips, and dust can pose health hazards if not properly managed, it is required to disclose to residents in military family housing the existence of known lead-based paint and/or lead-based paint hazards.

In addition to the disclosure of known lead-based paint and/or lead-based paint hazards, residents are also required to receive the pamphlet entitled 'Protect Your Family From Lead In Your Home.' The address of the unit provided the disclosure statement and pamphlet, the signature of the occupant as applicable, and the date of signature should also be recorded. The following is a sample disclosure statement that could be used:

I have been informed of the known lead-based paint/lead-based paint hazard and records and reports available to me. In addition, I have received a copy of the pamphlet, "Protect Your Family From Lead In Your Home", informing me of the potential risk of lead hazard exposure.

APPENDIX K

SAMPLE ACKNOWLEDGMENT AND CERTIFICATION STATEMENTS FOR RENOVATION PROJECTS

D-1. EPA SAMPLE ACKNOWLEDGEMENT STATEMENT

Acknowledgment shall include a statement of receipt of the pamphlet prior to the start of renovation, the address of the unit undergoing renovation, the signature of the owner or occupant as applicable, and the date of signature. A sample of language that could be used for such acknowledgment:

I have received a copy of the pamphlet, "Protect Your Family From Lead In Your Home", informing me of the potential risk of lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before the work began.

D-2. EPA SAMPLE CERTIFICATION STATEMENT

Certification of attempted delivery: When an occupant is unavailable for signature or refuses to sign the acknowledgment of receipt of the pamphlet, the renovator is permitted to certify delivery for each instance. The certification shall include the address of the unit undergoing renovation, the date and method of delivery of the pamphlet, names of the persons delivering the pamphlet, reason for lack of acknowledgment (e.g., occupant refuses to sign, no adult occupant available), the signature of the renovator, and the date of signature. A sample of language that could be used under the following circumstances:

a. Unavailable for signature: ***I certify that I have made a good faith effort to deliver the pamphlet, "Protect Your Family From Lead In Your Home", to the unit listed below at the dates and times indicated, and that the occupant was unavailable to sign the acknowledgment. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door***.

b. Refusal to sign: ***I certify that I have made a good faith effort to deliver the pamphlet, "Protect Your Family From Lead In Your Home", to the unit listed below, and that the occupant refused to sign the acknowledgment. I further certify that I have left a copy of the pamphlet at the unit with the occupant***.

APPENDIX L

"PROTECT YOUR FAMILY FROM LEAD IN YOUR HOME"